

UNITED STATES OF AMERICA

v.

CRIMINAL NO: 04-10262-DPW

DEBRA D'ANDREA and  
ROBERT D'ANDREA

Defendants

**DEFENDANTS' JOINT MOTION FOR DOWNWARD DEPARTURE**

Debra and Robert D'Andrea hereby jointly move this Honorable Court to downward depart from the otherwise applicable Guideline Sentencing Range of 12-18 months in their cases and impose a sentence on each of them consisting of appropriate periods of home confinement, community service and probation.

As reason therefore, defendants state that the instant offenses are outside the heartland of the typical tax violation for failure to withhold and pay over taxes under 26 U.S.C. sec. 7202. In support hereof, Defendants respectfully direct the Court's attention to their Joint Sentencing Memorandum and Affidavit of Debra D'Andrea [**Filed Under Seal**] filed herein, as well as the numerous letters of recommendation submitted by friends, family, colleagues and others.

By their attorneys,

s/

s/

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